

**Federal Defenders
OF NEW YORK, INC.**

Southern District
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David E. Patton
Executive Director

Southern District of New York
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MEMO ENDORSED

October 21, 2021

BY ECF

The Honorable Judge Sidney H. Stein
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

RE: United States v. Desirae Schneider
20 Cr. 325 (SHS)

Dear Judge Stein:

I write to request a temporary modification to Desirae Schneider's bail conditions in the above-captioned case to allow Ms. Schneider to travel from her parents' home to Franklin, WI to spend the night with her sister and brother-in-law at their home on Saturday, October 23 through Sunday, October 24, 2021. Pretrial services and the Government do not object to this request.

On March 16, 2020, Ms. Schneider was presented in Magistrate Court. The following bail conditions were set and subsequently met:

\$50,000 personal recognizance bond to be co-signed by two financially responsible persons; compliance with pre-trial supervision and mental health treatment as directed; surrender of travel documents with no new applications and travel restricted to the Southern District of New York; no contact with the alleged victim outside the presence of counsel; surrender keys to the complainant's home; continued employment; no "dark web" use; no possession of firearms/destructive devices/other weapons; and GPS monitoring.

On April 12, 2021, Ms. Schneider pled guilty to the one-count indictment and remained out on bond. On June 30, 2021, the Court held Ms. Schneider's sentencing hearing but has not yet imposed a sentence. The Court modified Ms. Schneider's conditions of release to include drug testing and treatment as directed by pretrial services. Ms. Schneider's sentencing is currently scheduled for November 3, 2021.

Since Ms. Schneider's release, she has made a series of requests for temporary bail modifications permitting her to travel out of the district (primarily to Astoria, Queens, only 15

minutes away from her home) with no objection from pretrial services or the Government. For the past year and a half, she has remained in constant compliance with the conditions of her release. Most recently, in September 2021, with the Court's permission Ms. Schneider attended a friend's event in Denver, CO.

Ms. Schneider now respectfully requests a temporary bail modification to allow her to travel from her parents' home in Illinois to Franklin, WI to spend the night with her sister and brother-in-law on Saturday, October 23 through Sunday, October 24, 2021. Pretrial services and the Government do not object to this request.

Thank you for your consideration of this request.

Respectfully submitted,

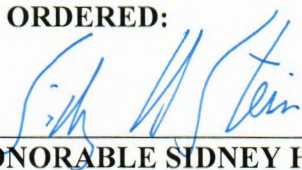
/s/

Marne L. Lenox
Assistant Federal Defender
(212) 417-8721

Defendant's request to travel is granted.

**Dated: New York, New York
October 21, 2021**

SO ORDERED:


HONORABLE SIDNEY H. STEIN
United States District Judge

cc: Rebecca Dell, Assistant U.S. Attorney